UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN THE MATTER OF THE SEIZURE OF)	
\$102,120 IN UNITED STATES CURRENCY)	M.B.D. No. 23-MC-91589
SEIZED ON DECEMBER 15, 2022)	

ASSENTED-TO MOTION TO EXTEND DEADLINE FOR THE UNITED STATES TO FILE CIVIL FORFEITURE COMPLAINT

The United States of America, by its attorney, Joshua S. Levy, Acting United States Attorney for the District of Massachusetts, with the assent of the only person to identify themselves as a claimant to date, pursuant to 18 U.S.C. § 983(a)(3)(A), respectfully requests an extension of time to file a civil complaint against the following seized property:

a. \$102,120 in United States currency, seized on December 15, 2022, being held in the District of Massachusetts (the "Property").

A proposed order is attached to this motion.

The Drug Enforcement Administration ("DEA") seized the Property and commenced administrative forfeiture proceedings. On or about August 14, 2023, the DEA received a claim for the Property from Tito Ramirez (the "Claimant"), through his attorney William Keefe. No other claims were submitted. On August 23, 2023, the United States received a copy of this claim from the DEA. The United States has a 90-day deadline to file a civil complaint against the Property pursuant to 18 U.S.C. § 983(a)(3), which is November 12, 2023.

Pursuant to 18 U.S.C. § 983(a)(3)(A), the Court may extend the time to file a civil forfeiture action upon agreement of the parties. The undersigned Assistant United States Attorney requires additional time to review the seizure and claim of the Claimant and conferred with counsel for the Claimant on October 30, 2023, regarding this extension. On November 1, 2023, counsel for the Claimant assented to the requested extension.

WHEREFORE, the United States respectfully requests that the Court grant its request and extend the deadline to file a civil forfeiture complaint for an additional 60 days, or up to and until January 11, 2024.

Respectfully submitted,

JOSHUA S. LEVY Acting United States Attorney

By: /s/ Raquelle L. Kaye

RAQUELLE L. KAYE

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Dated: November 1, 2023 Raquelle.Kaye@usdoj.gov

CERTIFICATE OF SERVICE

I, Raquelle L. Kaye, Assistant United States Attorney, certify that the foregoing motion filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and electronically mailed to attorney William Keefe.

/s/ Raquelle L. Kaye
RAQUELLE L. KAYE

Dated: November 1, 2023 Assistant United States Attorney